

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: John P. Kerr a/k/a John Kerr
Debtors**

BK NO. 23-10496 MDC

**Deutsche Bank National Trust Company, as
Indenture Trustee, for New Century Home
Equity Loan Trust 2006-1**

Chapter 13

Movant

Hearing Date: 06/15/2023 @ 9:30 AM

vs.

**John P. Kerr a/k/a John Kerr
Kenneth E. West, Trustee**

Respondents

**OBJECTION OF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
INDENTURE TRUSTEE, FOR NEW CENTURY HOME EQUITY LOAN TRUST 2006-1
TO CONFIRMATION OF CHAPTER 13 PLAN**

Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-1 (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On April 21, 2023, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$75,980.88.
2. Debtor's Plan provides for payment in the amount of \$70,590.27 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$5,390.61, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.

5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-1, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: May 1, 2023

By: /s/Brian C. Nicholas, Esquire
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